

REMARKS

I. Formal Matters

Claims 1-12 and 14-23 are all the claims presently pending in the Application. By this Amendment, Applicant editorially amends claims 1-4 and 7. The amendments to claims 1-4 and 7 were made for reasons of consistency and precision of language. By this Amendment, Applicant also adds new claims 14-23. Ample support for the newly added claims can be found throughout the specification. Further, Applicant has canceled claim 13 without prejudice.

II. Claim Rejections Under 35 U.S.C. § 102

The Examiner has rejected claims 1-3 and 5-12 under 35 U.S.C. § 102(e) as allegedly being anticipated by Takahiro Fuchigami et al. (U.S. Patent No. 6,657,746). Applicant respectfully disagrees.

With respect to claim 1, Applicant respectfully asserts that Fuchigami fails to disclose, or even suggest, “**a partial function derivation step** that derives ... a partial function representative of a color conversion between coordinates in the area and coordinates of the second color space ... ; and a **whole function derivation step that ... combines the partial functions.**”

Instead, Fuchigami is directed to constructing a look up table (LUT) having small conversion error. In this regard, Fuchigami teaches performing calculations for hue, chroma and brightness and adjusting the lattice points using these calculations, in order to create a LUT that will be used to convert image data from the input (RGB) color space to the output (CMYK) color space. However, Fuchigami only teaches a **single** color converting section, which converts image data from the input color space to the output color space with reference to the LUT. (See, Col. 5, ll. 9-15 and FIG. 1, element (1b)). In other words, the LUT itself does not include **any**

partial function conversions between the input and output color spaces. Instead, the LUT only provides more accurate reference data to make the desired conversion.

As such, there is simply no disclosure of a “partial function derivation step ... for each of the areas” nor is there disclosure of a “whole function derivation step that ... combines the partial functions.” For at least this reason, Applicant respectfully asserts that claim 1 overcomes the cited art of record.

Additionally, the Examiner cites Col. 3, ll. 9-13 as allegedly teaching the partial function and Col. 3, ll. 14-19 as allegedly teaching the whole function. However, Col. 3 merely summarizes division of hue, chroma and brightness (see Col. 2, line 66 to Col. 3, line 22) and conversion of a single target point based on individual weighing for the hue, chroma and brightness divisions. Fuchigami describes this in detail at Cols. 5-6. Thus, the alleged partial functions are not for conversion of color space, but different color criteria. Similarly, the aggregation cited by the Examiner relates to a single lattice point and not conversion of a space in its entirety. For at least this additional reason, Applicant respectfully asserts that Fuchigami fails to anticipate each of the elements recited in claim 1.

Furthermore, with respect to claim 1, the cited art of record fails to disclose, or even suggest, **“combin[ing] the partial functions by obtaining a coefficient interpolated by the coefficient of the partial function for each of the overlapped areas”** and by deriving a function represented by the interpolated coefficient.” As such, Applicant respectfully asserts that claim 1 is allowable over the cited art of record.

With respect to claims 2, 5 and 6, these claims depend from independent claim 1. As such, claims 2, 5 and 6 are allowable at least by virtue of their dependency from claim 1. They are also allowable because of the additional limitations recited therein.

For example, with respect to dependent claim 5, Applicant respectfully asserts that Fuchigami fails to disclose, or even suggest, "each area formed by the area forming step [being] of equal size."

Instead, each area of Fuchigami is based on one of the three attributes; brightness, hue or chroma. (See Col. 5, ll. 59-62). As such, each image input into the color conversion device of Fuchigami will have varying areas based on each of the three attributes.

The Examiner asserts that this limitation is somehow met by pointing to the lattice, which is formed of squares of equal size. However, Applicant respectfully disagrees, as the lattice is simply a three-dimensional representation of the input (RGB) color space. This is shown, for example in FIG. 12. The lattice points of the input color space are then assigned an area based on the color attribute of the color input data. For at least this reason, Fuchigami fails to teach or even suggest, the areas formed by the area forming step being of equal size.

With respect to independent claims 3 and 7, Applicant respectfully asserts that claims 3 and 7 are allowable for reasons analogous to those recited with respect to independent claim 1.

Furthermore, with respect to claims 8-11, these claims depend from independent claim 7, and as such are allowable at least by virtue of their dependency from claim 7. They are also allowable because of the additional limitations recited therein. Similarly, with respect to claim 12, this claim is dependent from independent claim 3. As such, Applicant respectfully asserts that claim 12 is allowable at least by virtue of its dependency from independent claim 3.

III. Claim Rejections Under 35 U.S.C. § 103

Claim 4 has been rejected by the Examiner under 35 U.S.C. § 103(a) as allegedly being unpatentable over Fuchigami in view of well known prior art. Applicant respectfully disagrees.

With regard to independent claim 4, Applicant respectfully asserts that claim 4 is allowable for reasons analogous to those recited with respect to independent claim 1.

The Examiner has also rejected claim 13 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Fuchigami in view of Adobe Postscript Technical Note #5124 (hereinafter "the Note"). With regard to claim 13, this claim has been canceled. As such, this rejection is now moot.

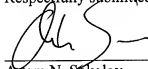
IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

This Application is being filed via the USPTO Electronic Filing System (EFS). Applicant herewith petitions the Director of the USPTO to extend the time for reply to the above-identified Office Action for an appropriate length of time if necessary. Any fee due under 37 U.S.C. § 1.17(a) is being paid via the USPTO Electronic Filing System (EFS). The USPTO is

also directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Artem N. Sokolov
Registration No. 61,325

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: March 14, 2008